

1 LITTLER MENDELSON, P.C.
2 Michelle A. Clark, Bar No. 243777
3 MiClark@littler.com
4 Gerardo Hernandez, Bar No. 292809
5 Ghernandez@littler.com
6 5200 N. Palm Ave.
7 Ste. 302
8 Fresno, CA 93704-2227
9 Telephone: 559.244.7500
10 Fax: 559.244.7525

11 Attorneys for Defendant
12 UNITED AIRLINES, INC.

13
14 UNITED STATES DISTRICT COURT
15
16 EASTERN DISTRICT OF CALIFORNIA

17 ROGER SOTO,

18 Case No. 2:23-cv-02148

19 Plaintiff,

20
21 **JOINT STIPULATION TO EXTEND TIME
22 FOR DEFENDANT TO FILE AN ANSWER TO
23 INITIAL COMPLAINT AND ORDER**

24 v.
25 UNITED AIRLINES, INC.; and DOES 1-
26 10,

27 Defendants.
28
29 Complaint Served: November 17, 2023
30 Current Response Date: December 8, 2023
31 New Response Date: January 9, 2024

32 Trial Date: None Set
33 District Judge:
34 Complaint Filed: September 27, 2023

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36 **STIPULATION AND REQUEST TO EXTEND TIME TO
37 FILE AN ANSWER TO INITIAL COMPLAINT**

38 Plaintiff ROGER SOTO (“Plaintiff”) and Defendant UNITED AIRLINES, INC.
39 (“Defendant”) (collectively “Parties”), by and through their attorneys of record in this case, stipulate
40 and agree as follows:

41 WHEREAS, Plaintiff filed this action in the United States District Court for the
42 Eastern District of California, Fresno Division, on September 27, 2023;

43 WHEREAS, Plaintiff served his Summons and Complaint on Defendant on
44 November 17, 2023;

WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), (b), (e), (f), 81(c), Defendant's deadline to respond to Plaintiff's Complaint is December 8, 2023;

WHEREAS, IT IS STIPULATED by and between Plaintiff, on the one hand, and Defendant, that, Defendant shall have an extension of 32 days to respond to Plaintiff's Complaint. This extension of time is Defendant's first extension and does not alter the date of any event or deadline already fixed by Court order.

WHEREAS, this STIPULATION is entered into pursuant to Defendants' counsel's email to Plaintiffs' counsel on December 1, 2023 detailing that Defendants' counsel received the summons and complaint on short notice and was out of the office on personal leave.

WHEREAS, Plaintiff ROGER SOTO (“Plaintiff”), and Defendant UNITED AIRLINES, INC. jointly stipulated in said email to extend the time for UNITED AIRLINES, INC. to file an answer to the initial complaint from December 8, 2023, to January 9, 2024.

It is, **THEREFORE**, stipulated and agreed by and between the parties as follows:

Defendants be granted an extension until January 9, 2024, to file its answer to Plaintiffs' Initial Complaint.

Respectfully Submitted,

Dated: December 6, 2023

LITTLER MENDELSON, P.C.

By: /s/ Gerardo Hernandez
MICHELLE A. CLARK
GERARDO HERNANDEZ
Attorneys for Defendant
UNITED AIRLINES, INC.

Dated: December 6, 2023

BARNES LAW

By: /s/ Robert E. Barnes
ROBERT E. BARNES
Attorneys for Plaintiff
ROGER SOTO

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2
3 **SIGNATURE ATTESTATION**
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5 I hereby attest that all signatories listed above, on whose behalf this stipulation is submitted,
6 concur in the filing's content and have authorized the filing.
7

8
9 Dated: December 6, 2023 LITTLER MENDELSON, P.C.
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12 By: /s/ Gerardo Hernandez
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14 MICHELLE A. CLARK
15 GERARDO HERNANDEZ
16 Attorneys for Defendant
17 UNITED AIRLINES, INC.
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19 **ORDER**
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21 PURSUANT TO STIPULATION, the defendant's time to serve and file a response to
22 Plaintiff's complaint shall be extended through and including January 9, 2024.
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24 IT IS SO ORDERED.
25

26 Dated: December 6, 2023
27

28 /s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE